

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

AMIN KHOURY,

Defendant

Case No. 20-cr-10177-PBS

DEFENDANT AMIN KHOURY'S PROPOSED VOIR DIRE

Defendant Amin Khoury respectfully requests that the Court pose the following *voir dire* questions to prospective jurors during the jury selection process. In addition, Mr. Khoury reserves the right to propose additional questions and follow-up questions during the jury selection process, and to submit additional individual *voir dire* requests should the Court deny Mr. Khoury's contemporaneous proposal for a written juror questionnaire.

I. The Court's General Voir Dire Questions

1. Do you have any knowledge of the prosecutors?
2. Do you, a family member, or a close friend work for the U.S. Attorney's Office in Boston?
3. Do you, a family member, or a close friend work in any U.S. Attorney's Office, District Attorney's office, or for the Attorney General's office?
4. Do you, a family member, or a close friend work for a prosecutor's office, either at the state or federal level?
5. Do you have any knowledge of the defendant or his lawyers?
6. Has anyone ever been involved in litigation with the defense lawyers?

7. Does anyone know anything about this case?
8. Is anyone aware of any bias or prejudice you might have in this case or this kind of case that you cannot serve in a fair and impartial manner?
9. Has anyone read anything in the press about this case?
10. Does anyone know of any personal or financial interest they might have in the outcome of this case?
11. Does anyone have any knowledge of any of the potential witnesses?
12. Do you, a family member, or a close friend work at the relevant companies / organizations?
13. Will anyone's prior service on a jury interfere with their ability to be a fair and impartial juror?
14. Anyone who themselves or have close family members or friends who work for any police force, law enforcement, prosecutor's office, or a security agency?
15. Anyone who believes that a police officer or a federal agent is more likely to tell the truth than an ordinary citizen?
16. Anyone who believes that a police officer or a federal agent is less likely to tell the truth than an ordinary citizen?
17. Anyone who has such strong feelings about criminal defense attorneys that they cannot serve as a fair and impartial juror?
18. Anyone who has such strong feelings about prosecutors that they cannot serve as a fair and impartial juror?
19. Anyone who has been charged, either themselves or any close family members or friends, in any felony criminal proceedings at either the state or federal level?
20. Anyone who has been a witness in a criminal proceeding in any state or federal level?
21. Anyone who serving on this jury would cause a substantial personal hardship (childcare, non-reschedulable surgery, sole caregiver)?
22. Any other potential bias or prejudice?
23. Anyone who has problems with English that would make it difficult for them to understand the case?

24. Anyone who has problems with hearing or sight?
25. Anyone who has such strong religious beliefs that it prevents them from serving on a jury?
26. Anyone who cannot follow the basic constitutional principle that says a defendant is presumed innocent unless and until proven guilty?
27. Anyone who cannot follow the basic constitutional principle that the government bears the burden of proof beyond a reasonable doubt?
28. Anyone who cannot follow the basic constitutional principle that the defendant does not have to produce any evidence and has no obligation to testify?

II. Amin Khoury's Proposed Jury Voir Dire

1. This case has been referred to by the media as being connected with "Varsity Blues" or the "college admissions" cases. Have you read any articles or books, watched any news, read any information in websites or news feeds on the internet, or viewed other media coverage, such as a documentary, related to the "Varsity Blues" cases or the "college admissions" cases? If yes, how much media coverage have you seen? Do you have any feelings about this case or the subject matter which would make it difficult for you to render a fair and impartial judgment based solely on the evidence presented at trial?
2. Do you have any background, training, or experience related to college admissions, private high school admissions, collegiate coaching, or any other field related to collegiate consulting?
3. Have you, a relative, or a close friend ever made a donation or contribution to a college or university?
4. Do you have such strong feelings about the college admissions process, college admissions consultants, or people that work in college admissions departments that you could not be a fair and impartial juror in this case?
5. Have you, a relative, or a close friend ever played sports in college? If yes, what level; how many years played; did they receive an athletic scholarship to play?
6. Do you hold any negative feelings or opinions regarding wealthy and / or successful people that would impact your ability to be fair and impartial in this case?

7. Do you have such strong views on underage drinking that you could not be fair and impartial in this case?
8. Do you have any information, bias, or prejudice that may affect your ability to listen carefully to the testimony in this case, to remain impartial, and to render a true and just verdict based solely on the evidence presented at trial?

Respectfully submitted,

AMIN KHOURY,

By his attorneys,

/s/ Eóin P. Beirne

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Dated: March 25, 2022

CERTIFICATE OF SERVICE

I, Eóin P. Beirne, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 25, 2022.

/s/ Eóin P. Beirne

Eóin P. Beirne (BBO # 660885)